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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JAVIER CABRERA, an individual;
DEBORAH MILLER, an individual,
CHERIE MANCINI, an individual;
NEVADA SERVICE EMPLOYEES
UNION STAFF UNION ("NSEUSU"),
an unincorporated association,

Plaintiffs,

vs.

SERVICE EMPLOYEES
INTERNATIONAL UNION, a nonprofit
cooperative corporation; LUISA BLUE,
in her official capacity as Trustee of
Local 1107; MARTIN MANTECA, in
his official capacity as Deputy Trustee of
Local 1107; MARY K. HENRY, in her
official capacity as Union President;
CLARK COUNTY PUBLIC
EMPLOYEES ASSOCIATION dba
NEVADA SERVICE EMPLOYEES
UNION aka SEIU LOCAL 1107, a
nonprofit cooperative corporation;
CAROL NIETERS, an individual; DOES
1-20; and ROE CORPORATIONS 1-20,
inclusive,

Defendants.

Case No.: 2:18-cv-00304-RFB-DJA

**STIPULATION AND ORDER
TO VACATE PRETRIAL
DEADLINES AND HEARINGS**

The parties to this Case, each acting through their counsel of record, respectfully report that they have reached agreements regarding settlement of the remaining claims, defenses, and issues set to be tried. The parties are actively preparing formal written settlement agreements. Accordingly, the parties do hereby request the Court's Order vacating (or postponing for at least 30 days) the present deadlines set for all pre-trial filings and hearings¹ set in the Case, which will provide the parties the additional time required to finalize the settlements.

CHRISTENSEN JAMES & MARTIN

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¹ On January 31, 2024, the Court issued an Amended Order Regarding Trial [ECF 305], in which earlier deadlines were set for various pre-trial documents (exhibits lists, proposed findings of fact and conclusions of law, proposed jury instructions, proposed voir dire, and trial briefs) all of which were made to fall due on March 1, 2024. On February 7, 2024, the Court issued a Minute Order [ECF 306] directing the parties to file a Joint Status Report "as to their preparedness to proceed to trial" on or before March 6, 2024.

ORDER

Good Cause Appearing, the Court grants the parties' stipulation and hereby vacates the pre-trial deadlines and hearings set in this Case. The parties shall file an appropriate stipulation to dismiss the case within 30 days.

United States District Court Judge

Dated: _____